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1 UNITED STATES DISTRICT COURT
2
3 NORTHERN DISTRICT OF CALIFORNIA
4
5 SAN FRANCISCO DIVISION

6 **IN RE GOOGLE PLAY STORE**
7 **ANTITRUST LITIGATION**

8 THIS DOCUMENT RELATES TO:

9 *In re Google Play Consumer Antitrust*
10 *Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-md-02981-JD

11 **DECLARATION OF RISHI SATIA IN**
12 **SUPPORT OF JOINT OMNIBUS**
13 **ADMINISTRATIVE MOTION TO FILE**
14 **UNDER SEAL**

15 Judge: Hon. James Donato
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1 1. I, Rishi Satia, am an attorney at Morgan, Lewis & Bockius LLP, counsel of record
2 for Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Payment
3 Corp., Google Asia Pacific Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in this
4 multi-district litigation (MDL). I am a member in good standing of the State Bar of California
5 and admitted to practice in the state and federal courts of California. I respectfully submit this
6 declaration in support of Parties’ Joint Omnibus Administrative Motion to File under Seal related
7 to Consumer Plaintiffs’ Motion for Class Certification and Defendants’ Motion to Exclude
8 Testimony of Dr. Hal J. Singer on Class Certification, and the related materials and briefings
9 filed in support of and in opposition of those motions (“Sealing Motion”). I have personal
10 knowledge of the facts or circumstances set forth herein. If called upon as a witness in this
11 action, I could and would testify competently thereto.

12 2. As discussed in detail in the Declaration of Christian Cramer (“Cramer
13 Declaration”), Google asserts that public disclosure of its information will cause severe and
14 irreparable harm to not only Google’s business relationships and its competitive position in the
15 marketplace, but also that of Google’s business partners. As part of the process for preparing the
16 Sealing Motion, the Parties in good faith prepared notices for 305 non-parties whose confidential
17 information had been included in Consumer Plaintiffs’ Motion for Class Certification and
18 Defendants’ Motion to Exclude Testimony of Dr. Hal J. Singer on Class Certification, and the
19 related materials and briefings filed in support of and in opposition of those motions, identifying
20 non-parties’ confidential information and determining whether those non-parties would support
21 this Sealing Motion as it relates to their information. Certain parties have submitted declarations
22 in support of this Sealing Motion, which are included in Paragraph 5 below and attached to this
23 declaration.

24 3. As stated in the Sealing Motion, while Consumer Plaintiffs and Google
25 (“Parties”) took no position on each other’s specific sealing requests, the Consumer Plaintiffs
26 have indicated that they oppose 17 of Google’s sealing requests. Attached herewith as **Exhibit**
27

1 **B1** is a true and correct copy of a table identifying the 17 contested sealing requests along with
2 Google's and Consumer Plaintiffs' position statement for each request.

3 4. Consumer Plaintiffs have submitted a declaration in support of their request to
4 seal certain PII of named plaintiffs that were included in exhibits to Consumer Plaintiffs' Class
5 Certification Motion, and which are not relevant to any material issue in this case. A true and
6 correct copy of the Declaration of Kathleen A. Herkenhoff in support of Consumer Plaintiffs'
7 sealing requests is attached herewith as **Exhibit B2**.

8 5. Google and Consumer Plaintiffs jointly notified other parties in this litigation
9 whose confidential information had been included in Consumer Plaintiffs' Motion for Class
10 Certification and Defendants' Motion to Exclude Testimony of Dr. Hal J. Singer on Class
11 Certification, and the related materials and briefings filed in support of and in opposition of those
12 motions. In response to those notices Epic Games, Inc. ("Epic") and Match Group, Inc.
13 ("Match") submitted declarations in support of their sealing requests. Attached herewith as
14 **Exhibit B3** is a true and correct copy of the Declaration of Adrian Ong in support of Match's
15 requests to seal certain information subject to the Sealing Motion. And attached herewith as
16 **Exhibit B4** is a true and correct copy of the Declaration of Yonatan Even in support of Epic's
17 requests to seal certain information subject to the Sealing Motion.

18 6. Pursuant to the non-party notification process described in Paragraph 2 above,
19 fifty-five non-parties indicated that they are joining the Sealing Motion where it pertains to some
20 or all of their information. Certain non-parties, however, have represented that submitting a
21 declaration on behalf of their own interests would itself reveal confidential information, e.g.,
22 their identity as a participant in a particular Google Program or as a counterparty to an
23 agreement, and thus the Sealing Motion and the Declaration of Christian Cramer, submitted
24 concurrently, identifies those instances, and maintains the anonymity of those non-parties.

25 7. Of the fifty-five non-parties that are joining the Sealing Motion, forty-six
26 submitted declarations in support of the Sealing Motion, true and accurate copies of which are
27 attached herewith as:

- a. **Exhibit B5:** Declaration of Omer Salik (Activision Blizzard)
- b. **Exhibit B6:** Declaration of Matthew Norris (Adobe)
- c. **Exhibit B7:** Declaration of Jon Kirk (Amazon)
- d. **Exhibit B8:** Declaration of Yoshi Matsuzawa (Ancestry.com)
- e. **Exhibit B9:** Declaration of Yusuke Toyama (Aniplex)
- f. **Exhibit B10:** Declaration of Peter Stern (Apple)
- g. **Exhibit B11:** Declaration of Caeli A. Higney (Apple)
- h. **Exhibit B12:** Declaration of Corina Cacovean (AppLovin and certain AppLovin subsidiaries)
- i. **Exhibit B13:** Declaration of Jeffrey Ezell (AT&T)
- j. **Exhibit B14:** Declaration of Matthew Datum (Bandai Namco Entertainment)
- k. **Exhibit B15:** Declaration of James Riney (Big Fish and Product Madness)
- l. **Exhibit B16:** Declaration of Li Jin (Century Games)
- m. **Exhibit B17:** Declaration of Byron Hill (Dropbox)
- n. **Exhibit B18:** Declaration of Rodrigo Larrimbe (Etermax)
- o. **Exhibit B19:** Declaration of Vadikh Giniatulin (Geo Track Technologies)
- p. **Exhibit B20:** Declaration of Jason Stephen (GoPro)
- q. **Exhibit B21:** Declaration of James Hong (Gravity Interactive)
- r. **Exhibit B22:** Declaration of Gary Hsueh (Grindr)
- s. **Exhibit B23:** Declaration of Oleksandr Pasykov (Hily)
- t. **Exhibit B24:** Declaration of Frank Liu (InShot)
- u. **Exhibit B25:** Declaration of Joshua Yguado (JamCity)
- v. **Exhibit B26:** Declaration of Joseph Bial (Line)
- w. **Exhibit B27:** Declaration of Timothy S. Montgomery (MasterCard)

- 1 **x. Exhibit B28:** Declaration of Eric Meiring (Meta)
- 2 **y. Exhibit B29:** Declaration of Dan Bomze (MileIQ)
- 3 **z. Exhibit B30:** Declaration of Joe Settineri (MyFitnessPal)
- 4 **aa. Exhibit B31:** Declaration of Jeff Shouger (Niantic)
- 5 **bb. Exhibit B32:** Declaration of Lisa J. Hammer (OnXmaps)
- 6 **cc. Exhibit B33:** Declaration of David Ring (Pandora)
- 7 **dd. Exhibit B34:** Declaration of Neill Feather (Pango)
- 8 **ee. Exhibit B35:** Declaration of Astineh Arakelian (PicsArt)
- 9 **ff. Exhibit B36:** Declaration of John L. McDonnell III (Pinger, Inc.)
- 10 **gg. Exhibit B37:** Declaration of Boris Katz (Plarium)
- 11 **hh. Exhibit B38:** Declaration of Kyu Sung Lee (Samsung)
- 12 **ii. Exhibit B39:** Declaration of Robert Gustafson (SciPlay)
- 13 **jj. Exhibit B40:** Declaration of Naoto Satokata (Sharp)
- 14 **kk. Exhibit B41:** Declaration of Bill Bradford (Smule)
- 15 **ll. Exhibit B42:** Declaration of David Jacobs (Sony)
- 16 **mm. Exhibit B43:** Declaration of Robert Gustafson (Spicerack)
- 17 **nn. Exhibit B44:** Declaration of Al-Amyr Sumar (The New York Times Company)
- 18 **oo. Exhibit B45:** Declaration of Jeff Giard (T-Mobile)
- 19 **pp. Exhibit B46:** Declaration of Jed Ritchey (Together Labs on behalf of IMVU)
- 20 **qq. Exhibit B47:** Declaration of Wei-Shen Mak (Viki)
- 21 **rr. Exhibit B48:** Declaration of Jean-Briac Perrette (Warner Bros.)
- 22 **ss. Exhibit B49:** Declaration of Irene Zhang (Xiaomi)
- 23 **tt. Exhibit B50:** Declaration of Ajay Singh (Nintendo)
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
2 19th day of August 2022 in San Francisco, California.

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4 DocuSigned by:
Rishi Pankaj Satia
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Rishi Satia